

**Simplot Responses to Agency Comments (May 13, 2016) on  
“Draft CERCLA Cover Material Source Evaluation Technical Memorandum”  
(March 2016 Submittal to the Agencies)**

**Specific Comments:**

**SC-1 Page 2, Section 1.1, second paragraph:** This paragraph describes the information following as addressing the Dinwoody material only. Section 2.2 addressed the Rex Chert/Limestone. Add “and Rex Chert / Limestone” after Dinwoody in the second sentence.

**Response:** The requested text has been added.

**SC-2 Page 3, Section 2.1, second paragraph:** Provide the range of selenium concentrations for soils sampling during the RI in Panel E Area 2 for comparison.

**Response:** The requested information has been added to the discussion.

**SC-3 Page 3, Section 2.1, second paragraph:** The text indicates that the Dinwoody borrow area was considered suitable as reclamation based on the suitability guidance. Provide the agronomic results and comparison criteria that was referenced in the text.

**Response:** The requested information has been added to the discussion.

**SC-4 Page 4, Section 2.1, fifth paragraph:** Provide further detail regarding the full characterization of the Dinwoody soils. This detail should include the Dinwoody source areas and concentration statistics. This information would be useful to determine if further testing is warranted and that concentrations have remained consistent at all source areas.

**Response:** Available data for Dinwoody material are summarized in new Table 2-2. For further site-specific characterization, Simplot plans to collect samples from test pits to be excavated in the proposed Dinwoody material source areas. Prior to that field investigation, Simplot will submit an investigation plan for agency review.

**SC-5 Page 5, Section 2.2, third paragraph:** Provide further information on the chemical properties of the Rex Chert / Limestone to determine if further testing is necessary.

**Response:** Available data for Rex Chert/limestone are summarized in new Table 2-3. The text has been revised to note that sample collection of Rex Chert/limestone is included in ongoing mining operations. No additional characterization of Rex Chert/limestone material sources is proposed by Simplot.

**SC-6 Page 7, Section 4, first paragraph:** The text states that “there are sufficient volumes of locally available Dinwoody for use in CERCLA covers”. However, in Section 2.1, seventh paragraph; the text states that “volumes of cover material that could be

needed for CERCLA remedy is not currently known”. Provide clarification as to the conflicting statements.

**Response:** The text in Section 4 has been clarified to indicate that the locally available Dinwoody for use in CERCLA covers (7.4 million cubic yards) exceeds the range of volumes anticipated (1.2 to 6 million cubic yards) although not yet specified. Further, the text in Section 2 has been revised to state that the volume of Dinwoody that could be needed has not been specified, pending evaluations conducted under the FS.

**SC-7 Table 2-1:** Check the footnotes to insure they are labeled correctly and/or applied correctly. It appears that at least a correction is needed for footnote e.

**Response:** The footnotes have been checked and corrected as needed.